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March 22, 2001

Via Hand Delivery

Adam Krinsky
Legal Advisor to Commissioner Gloria Tristani
Federal Communications Commission
Room 826
445 12th St, SW
Washington, DC 20554

Re: Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems – ET Docket No. 00-258 -- Written Ex Parte Communication

Dear Adam:

During your March 8 meeting with Reba Campbell and Edgar Hartzog of South Carolina Educational Television Commission (SCETV) regarding the allocation of spectrum for 3G wireless, you asked about the impact of segmentation on the SCETV state-wide ITFS network. Mr. Hartzog has prepared the enclosed analysis based on the Satellite Industry Association (SIA) rulemaking petition to designate the 2500-2520/2670-2690 MHz frequency bands for the Mobile Satellite Service (Docket RM-9911). Mr. Hartzog concludes that SIA's segmentation plan would "effectively destroy nearly 75%" of SCETV's ITFS network and that the usefulness of the network would be "significantly diminished if not destroyed" if portions of the ITFS/MMDS band were reallocated for 3G.

I am filing a copy of this letter with the Secretary's office so it can be associated with the docket in the referenced 3G proceeding.

Sincerely,

Kenneth D. Salomon

Enclosure

No. of Copies rec'd 0+2
List A B C D E

cc (w): Chairman Michael K. Powell
Commissioner Harold Furchtgott-Roth
Commissioner Susan Ness
Magalie Roman Salas
Charles Dziedzic
Julius P. Knapp
Brad Lerner

South Carolina Educational Television Commission

Comments on

Segmentation of the 2500-2690 MHz Band

South Carolina Educational Television Commission's (SCETV) mission is to provide a statewide educational communications network. The primary purpose of the network is to provide comprehensive educational opportunities to public schools, colleges, universities and for adult continuing education. The service is to support and enhance training for state agencies, private industry, and individuals, and to offer programs of cultural, historical and educational significance to the general public. SCETV's statewide telecommunications facilities have been in continuous adaptation over the years to new technologies and new instructional procedures and formats.

South Carolina is a primarily rural state with a 4.1 million population (2000). Of that number 669,342 (1998-99) are students, of which approximately 63% reside in rural areas. There are 86 public school districts and 1,114 public schools (Fall 1999).

In 1973, SCETV received its first "Construction Permit" for an ITFS station. Since that time, a full statewide ITFS network, at a cost of more than $28 Million dollars, has been designed and implemented. The ITFS network is supported by thirty-five(35) ITFS Distance Education Learning Centers that serve 723 schools with the remaining 391 schools scheduled to receive service as funds become available.

The statewide ITFS network consists of forty-nine(49) 10 watt transmitters and fifteen(15) One watt transmitters (see Table). The 10 watt stations serve the schools within a single or multiple school districts. The One watt stations are used to feed programming from the origination points to the 10 watt transmitters for retransmission into schools and other locations.

	10 Watt	1 Watt
A - Group	7	3
B - Group	9	3
C - Group	9	3
D - Group	8	1
E - Group	7	0
F - Group	4	1
G - Group	5	4
	49	15

In a recent matter before the "Commission" concerning the "Petition for Rulemaking" by the Satellite Industry Association to Amend the U. S. Table of Frequency Allocations to Designate the 2500-2520/2670-2690 MHz Frequency Bands for the Mobile Satellite Service; recently denied, SCETV determined that the proposed SIA segmentation plan would effectively destroy nearly 75% of SCETV's Distance Education network.

These frequencies sought by SIA equate to ITFS Channels A1, B1, A2 and part of B2 as well as part of G3 and G4. The reallocation would affect twenty-six(26) of the thirty-five(35) ITFS Distance Education Learning Centers; 597 of the 723 schools currently served and 323 of the remaining 391 schools that will receive service once funding is available. Therefore, 83% of the states K-12 schools would be affected. It would also affect 332,703 students currently served and 152,919 students that will be served or 73% of the total statewide K-12 student enrollment.

ITFS Stations		Currently Served		Unserved	
No.	Group	Schools	Students	Schools	Students
8	A	169	93,693	79	31,609
10	B	254	148,415	122	60,638
8	G	174	90,595	122	60,672
Totals		597	332,703	323	152,919

ITFS Stations Affected by the Proposed SIA Segmentation

SCHOOLS		STUDENTS	
Number of Public Schools	1,114	Total Statewide Student Count	669,342
A & B Group Schools	624	Student Count A & B Group	334,355
Percentage of Schools Affected	56%	Percentage of Students Affected	50%
G Group Schools	296	Student Count G Group	151,267
Percentage of Schools Affected	27%	Percentage of Students Affected	23%
A, B & G Group Schools	920	Student Count A, B & G Group	485,622
Percentage of Schools Affected	83%	Percentage of Students Affected	73%

Similarly, if the FCC reallocates all or part of the ITFS/MMDS spectrum for 3G services, the capacity, usefulness, and value of the ITFS spectrum would be significantly diminished if not destroyed. Even if only part of the spectrum is taken, many of South Carolina's educational institutions would lose their ITFS service altogether, while SCETV would face new equipment costs, service disruption and cutbacks, lower quality service and signal interference.

For all these reasons, SCETV opposes any reallocation of channels in the 2500-2690 MHz band from ITFS and MMDS and urges the FCC to move 3G mobile services into other available spectrum.

Respectfully Submitted,

Edgar A. Hartzog, Technical Manager
K-12 School Services

South Carolina Educational Television Commission
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Date: March 20, 2001